

## REMARKS

1. Claims 1-4, 6-12 and 15-23 are not unpatenable over Matsuura in view of Ebrahimi under 35 USC§103(a) because the combination of Matsuura and Ebrahimi does not disclose or suggest at least a "writing start area" where a user input is interpreted as a symbol "only if" the user input starts within the writing start area and ends within the handwriting input area as is recited by Applicant in the claims..

The Examiner states that Matsuura discloses a "writing start area" as is claimed by Applicant. This is not correct. As recited in Applicant's claim 1, the "writing start area" is included as part of the "handwriting input area" and requires that a pen down event be detected in one of the writing start areas in order for the user input to be interpreted as a symbol. Matsuura discloses "software keys 241 to 244" in an "outer peripheral portion of the screen" so as "**not to overlap**" a "handwriting input area." (see paragraph [0025]). The software keys 241-244 have various functions for "dynamic sentence input." There is absolutely no disclosure that in order for a user input to be interpreted as a handwriting symbol, as is claimed by Applicant, that a pen down event be detected in the "writing start area" and then followed by a pen move event in the handwriting input area. Rather, in Matsuura, the user selects one of the keys to execute a function with respect to what is already written, such as "insertion of a space, insertion of a line feed, deletion of characters" or other conversion functions. (parapgraph [0025]). It is quite clear from Matsuura, that the user has already provided some handwriting input into the user input area 2, and then desires to provide some grammatical editing, such as a line feed, when one of the boxes 241-244 is selected. In Matsuura, there is no disclosure that upon selection of one of the boxes 241-244, that nothing other than the execution of the corresponding or indicated function will take place. This is explicitly explained with reference to FIGS. 4-6 of Matsuura.

In FIG. 4 of Matsuura, the user "starts writing by pressing the display means 2". (paragraph [0040]). After the desired characters are input, the user can select one of

the software keys, such as key 244, to execute the respective function. (paragraph [0054]). Thus, in Matsuura, the user inputs to the handwriting input area 2 are in no way dependent on the user's selection or activation of one of the keys 241-244. There is no disclosure that any type of handwriting recognition process must begin in one of the areas represented by keys 241-244. Yet, Applicant's claimed subject matter explicitly recites that a user input is interpreted as a symbol "**only if**" the user input "**starts within said writing start area.**" There is no disclosure that any part of the handwriting process has to start, let alone involve, any one of keys 241-244. Thus, although the keys 241-244 may be shown within the boundary of the input area 2 of Matsuura, they are neither the same as, nor the equivalent of, the writing start area claimed by Applicant.

Combining Matsuura with Ebrahimi does not address or overcome at least this deficiency.

Ebrahimi is directed to providing the user with a graphical indication as to where on the display, the "handwritten information is to be entered." (Abstract, lines 6-7). Ebrahimi discloses buttons 20-24 that allows the user to select the type of character to be inputted, whether it be "alpha", "letters", or "punctuation". (Col. 2, lines 22-37). For example, when the "write punctuation button 24" is selected, the handwriting recognition program expects only punctuation and some numerical symbols to be written into the writing boxes 16. (Col. 2, lines 34-37). However, there is no disclosure in Ebrahimi that the user input will only be interpreted as a symbol if the input starts in one of the buttons 20-24 and ends in the input area 42.

The writing area in Ebrahimi is designated as area 42. (Col. 3, lines 17-19). Elements 44 and 46, referred to by the Examiner, are the character images within the writing areas 42. (Col. 3, lines 26-29). A writing mode, which defines the image of the character 44, 46 displayed, is selected either "automatically by default" or "at the users request." (Col. 3, lines 40-44). Thus, it is quite clear that Ebrahimi does not require that the user input begin in a "writing start area" as is claimed by Applicant, since the

lower case mode is selected "automatically by default." Rather, a "writing mode" is selected, and the corresponding user input must be in accordance with the displayed character image 44, 46. (Col. 3, lines 45-58).

Combining Matsuura with Ebrahimi does not result in Applicant's claimed subject matter. Rather, by combining Matsuura with Ebrahimi, the input area will include an "image of a character" that corresponds to the type of character to be inputted, which can be selected "automatically by default" and additional soft keys (241-244) that allow different sentence functions, such as a space insertion, to be executed. However, there is no "writing start area" where a user input is interpreted as a symbol "only if" the user input starts within the writing start area and ends within the handwriting input area as is recited by Applicant in the claims.

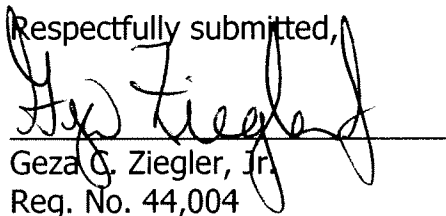
Therefore, a *prima facie* case of obviousness is not and cannot be established.

Claims 2-4, 6-12, 15-16, and 18-23 are also not obvious at least in view of their respective dependencies.

3. Claims 13, 14, 24 and 25 are not unpatentable over Matsuura in view of Ebrahimi and further in view of Dutta at least by reason of their respective dependencies.

The Commissioner is hereby authorized to charge any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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